

*SC NAACP v. Alexander,*  
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

# Exhibit D

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF SOUTH CAROLINA  
3 COLUMBIA DIVISION

4 THE SOUTH CAROLINA )  
5 STATE CONFERENCE OF )  
6 THE NAACP, et al., )

7 Plaintiffs, )

Case No. 3:21-CV-03302-MGL-  
TJH-RMG

8 vs. )

9 THOMAS C. )  
10 ALEXANDER, et al., )

11 Defendants. )  
12 )  
13 )

14 Videotaped Remote Deposition of  
15 SENATOR GEORGE EARLE CAMPSER, III  
16 (Taken by Plaintiffs)  
17 Isle of Palms, South Carolina  
18 Friday, August 5, 2022  
19  
20  
21  
22  
23

24 Reported in Stenotype by  
25 Lauren M. McIntee, RPR, CRR  
Transcript produced by computer-aided transcription

1           A.     No. They're the ones who rendered those  
2     opinions.

3           Q.     Based on your work as a subcommittee member,  
4     did you have any understanding of what test might be  
5     needed to assess concerns about racial gerrymandering?

6           A.     Yes, I did. Yeah.

7           Q.     And what's your understanding --

8           A.     I wasn't relying on my -- I wasn't relying on  
9     my legal opinion because this is not an area of the law  
10    that I deal with regularly, so I relied upon them.

11          Q.     I feel like I could -- I can close out maybe;  
12    maybe this question closes out this. It would be fair  
13    to say that for any compliance with federal law or the  
14    US Constitution, that would have been a question for  
15    Mr. Gore or Mr. Terreni?

16          A.     Yes, ultimately. I mean, you could have a  
17    contingent opinion or view or something, but ultimately  
18    you -- you go to them and say, what do you -- what do  
19    you think? What do we need -- should we do this?  
20    Should we not do it? So just a -- it's an ongoing  
21    process.

22          Q.     I now want to move on to Roman Numeral  
23    Number 3 entitled Additional Considerations. Do you see  
24    that?

25          A.     Yes.